1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

18

19

20

21

22

23

24

25

26

27

28

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IN RE: CATHODE RAY TUBE (CRT) ANTITRUST LITIGATION

This Document Relates to

Best Buy Co., Inc., et al. v. Hitachi, Ltd., et al., No. 11-cv-05513;

Target Corp., et al. v. Chunghwa Picture Tubes, Ltd., et al., No. 11-cv-05514;

Interbond Corporation of America v. Hitachi, et al., No. 11-cv-06275;

17 *Office Depot, Inc. v. Hitachi, Ltd., et al., No.* 11-cv-06276;

> CompuCom Systems, Inc. v. Hitachi, Ltd. et al., No. 11-cv-06396;

P.C. Richard & Son Long Island Corporation, et al. v. Hitachi, Ltd., et al., No. 12-cv-02648;

Schultze Agency Services, LLC v. Hitachi, Ltd., et al., No. Ĭ2-cv-02649;

ViewSonic Corporation, v. Chunghwa Picture Tubes, Ltd., et al., 3:14cv-02510;

Master File No. M:07-5994-SC MDL No. 1917

Case No. 3:11-cv-05513-SC

STIPULATION AND [PROPOSED] ORDER EXTENDING THE DEADLINE TO FILE MOTION TO COMPEL CHUNGHWA TO RESPOND TO DIRECT ACTION PLAINTIFFS' FIRST SET OF REQUESTS FOR **ADMISSION**

This Stipulation and Proposed Order Extending the Deadline to File Motion to Compel

between certain Direct Action Plaintiffs ("DAPs"), on the one hand, and defendants Chunghwa

Chunghwa to Respond to certain Direct Action Plaintiffs' First Set of Requests for Admission

L.L.P.		
LLER & CIRESI	AW	
ILLER	TÓRNEYS AT I	VEAPOLIS
N, M	TTÓRNE	MINN
KAPL	A	
OBINS,		

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

Picture Tubes,	Ltd. and Chunghw	a Picture Tubes	(Malaysia), (collectively,	"CPT"), c	n the
other hand, is ma	ade with respect to the	e following facts a	nd recitals:			

WHEREAS, on March 21, 2014, the Court entered a scheduling order setting the close of fact discovery for September 5, 2014. See Dkt. No. 2459;

WHEREAS, the deadline to file any motion to compel after the discover cut-off is September 12, 2014 (L.R. 37-3);

WHEREAS, on August 1, 2014, the DAPs served their First Set of Requests for Admission on CPT;

WHEREAS, on September 5, 2014, CPT served its Responses to DAP's First Set of Requests for Admission and stated objections on various grounds;

WHEREAS, the parties continue to meet and confer to narrow their differences;

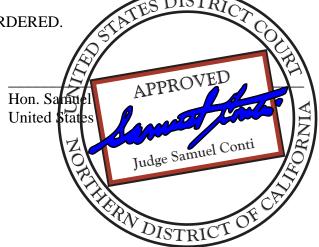
WHEREAS, the DAPs and CPT have conferred by and through their counsel and, subject to the Court's approval, HEREBY STIPULATE AS FOLLOWS:

- 2 -

1. The undersigned parties agree to extend the deadline for the DAPs to file a motion to compel relating to the DAP's First Set of Requests for Admission, to the extent one is deemed necessary by DAPs, to October 2, 2014.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: October 22, 2014



1	ROBINS, KAPLAN, MILLER & CIRESI L.L.P. DATED: September 25, 2014
2	
3	By: <u>/s/ Laura E. Nelson</u> Roman M. Silberfeld
3	David Martinez
4	Laura E. Nelson
5	Attorneys for Plaintiffs Best Buy Co., Inc.; Best Buy
6	Purchasing LLC; Best Buy Enterprise Services, Inc.; Best Buy Stores, L.P.; BESTBUY.COM, LLC; Magnolia
7	Hi-Fi, LLC
0	/s/ Philip J. Iovieno
8	Philip J. Iovieno
9	Anne M. Nardacci
4.0	BOIES, SCHILLER & FLEXNER LLP 30 South Pearl Street, 11th Floor
10	Albany, NY 12207
11	Telephone: (518) 434-0600
	Facsimile: (518) 434-0665
12	Email: piovieno@bsfllp.com
13	Email: anardacci@bsfllp.com
14	William A. Isaacson
1.	BOIES, SCHILLER & FLEXNER LLP
15	5301 Wisconsin Ave. NW, Suite 800 Washington, D.C. 20015
16	Telephone: (202) 237-2727
10	Facsimile: (202) 237-6131
17	Email: wisaacson@bsfllp.com
18	Stuart Singer
10	BOIES, SCHILLER & FLEXNER LLP
19	401 East Las Olas Blvd., Suite 1200
20	Fort Lauderdale, FL 33301
21	Telephone: (954) 356-0011 Facsimile: (954) 356-0022
21	Email: ssinger@bsfllp.com
22	Liaison Counsel for Direct Action and Attorneys for
22	Plaintiffs Electrograph Systems, Inc., Electrograph
23	Technologies, Corp., Office Depot, Inc., Interbond Corporation of America, P.C. Richard & Son Long Island
24	Corporation, MARTA Cooperative of America, Inc., ABC Appliance, Inc., Schultze Agency Services LLC on behalf
25	of Tweeter Opco, LLC and Tweeter Newco, LLC
26	Liaison Counsel for Direct Action Plaintiffs
27	
28	
	STIPULATION EXTENDING DEADLINE TO FILE

Case 3:07-cv-05944-JST Document 2934 Filed 10/22/14 Page 4 of 4

	1	Dated: September 25, 2014 By: /s/ Rachel Brass	
	2	Joel S. Sanders Rachel S. Brass	
	3	Christine A. Fujita	
	4	GIBSON, DUNN & CRUTCHER LLP 555 Mission Street, Suite 3000	
	5	San Francisco, CA 94105 Tel: 415-393-8200	
		Fax: 415-393-8206	
	6	Counsel for Defendants Chunghwa Picture Tubes, Ltd. and Chunghwa Picture Tubes (Malaysia)	
	7		
& CIRESI L.L.P.	8		
	9		
	10		
	11		
- JI	12		
[ILL] EYS A VEAPO)	13		
I, M ORNE MINN	14		
PLAI	15		
KAI	16		
ROBINS, KAPLAN, MILLER ATTÖRNEYS AT MINNEAPOLIS	17		
(OB)	18		
Н	19		
	20		
	21		
	22		
	23		
	24		
	25		
	26		
	27		

28